

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et.al.*¹

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

MOTION TO FILE PROOF OF CLAIM AFTER CLAIMS BAR DATE

COMES NOW Yumou Wei (“Wei”), by counsel, and for his motion to file his proof of claim after the bar date in this case states as follows:

1. The debtors filed this proceeding on November 11 and November 14, 2022 and the court set the deadline to file claims as September 29, 2023.
2. Wei brings this motion pursuant to Federal Bankruptcy Rule 9006(b)(1) and 3003(c)(3) because Wei did not receive timely notice of the bankruptcy customer claim bar date and access to the customer claim portal as hereinafter set below.

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson’s Commercial Complex, Friars Hill Road, St. John’s, Antigua and Barbuda.

3. Wei resides at K25-01 Yutianxia Sanqi Tianzhu Shunyi District, Beijing China.
4. Wei's email address is Richard.y.wei@gmail.com.
5. Wei did not receive any notification from FTX Trading Ltd. or their bankruptcy claim agent, Kroll Restructuring Administration, regarding their establishment of an online portal to file a claim.
6. However, in March 2023, Wei received an email notification from what he believed to be from Kroll Restructuring Administration from the email address ftx@noticing.ra.kroll.com that a claim was already filed on Wei's behalf for USD[13102.0753079146530232000000000000].
7. When Wei attempted to verify his FTX account balance, which he believed to be closer to \$70,000.00 USD in cash plus additional crypto currency. Wei's crypto currency held in his FTX Trading Ltd. account included 3,000 FTT, 13,000.00 Seco, 10,000 MATIC, 4.3 BNB, and 10,000.00 TRX. When Wei attempted to log into his account, he discovered his FTX account was locked out. He attempted to unlock his account to no avail.
8. On November 8, 2023, Wei was notified by a friend, who was also a FTX account holder, that there appeared to have been a cyber-security

incident that impacted FTX account holders receiving access to their accounts and that the incident may now be resolved. Wei's friend then sent him an email that he received from Kroll Restructuring Administration that outlined how to file a claim and the portal to do so.

9. Wei used this email information to attempt to file a claim. When Wei logged into the portal, it correctly reflected his balance of \$73,723.64 USD in cash. Wei's crypto currency held in his FTX Trading Ltd. account included 3,159.88 FTT, 13,642.06 Seco, 10,021.55 MATIC, 4.31 BNB, and 10,059 TRX. Wei proceeded to attempt to file the claim. The claim reflected 'Submitted' but Wei did not receive confirmation of 'Acceptance.'
10. Wei attempted to file the claim again on November 9, 2023, using the same instructions provided by his friend. Again the claim reflected 'Submitted' but Wei did not receive confirmation that the claim was 'Accepted.'
11. Immediately following the two failed attempts, Wei sought legal counsel and filed this Motion for the Extension of Time to File Proof of Claim.

WHEREFORE, Yumou Wei prays that this Court enter an order granting the motion to permit him to file his proof of claim after the bar date in this case or

alternatively to deem as filed timely the claim that Wei filed via the Kroll Restructuring Administration website on November 8, 2023, and grant such other relief as is equitable and just.

BROWNELL LAW GROUP LLC

Dated: November 17, 2023 BY: /s/ Felicia Brownell
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